

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

National Football League and  
NFL Properties LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**DECLARATION OF CHRISTOPHER A. SEEGER IN SUPPORT OF  
CO-LEAD CLASS COUNSEL'S MOTION TO COMPEL  
RD LEGAL FUNDING, LLC, RD LEGAL FINANCE, LLC,  
RD LEGAL FUNDING PARTNERS, LP, AND RONI DERSOVITZ  
TO RESPOND TO THE DISCOVERY REQUESTS PROPOUNDED  
IN ACCORDANCE WITH THE COURT'S ORDER OF JULY 19, 2017**

CHRISTOPHER A. SEEGER declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, the following:

1. Having been appointed as Co-Lead Class Counsel, I am fully familiar with the matters set forth herein, including the procedural history of this litigation and the class-wide Settlement that this Court approved on April 22, 2015 ("Settlement"), as well as the facts and procedural history leading up to the Court's issuance of the July 19, 2017 Order. I submit this

Declaration in support of Co-Lead Class Counsel's Motion to Compel RD Legal Funding, LLC, RD Legal Finance, LLC, RD Legal Funding Partners, LP, and Roni Dersovitz, to Respond to the Discovery Requests Propounded in Accordance with the Court's Order of July 19, 2017.

2. Attached hereto as Exhibit A is a true and correct copy of the Complaint filed in *Consumer Financial Protection Bureau v. RD Legal Funding*, No. 17-cv-00890 (LAP) (S.D.N.Y.) ("*CFPB v. RD Legal*"), at ECF No. 1.

3. Attached hereto as Exhibit B is a true and correct copy of Reply Brief in Support of Defendants' Motion To Dismiss, filed by RD Legal Funding, LLC, RD Legal Finance, LLC, RD Legal Funding Partners, LP, and Roni Dersovitz (collectively, "RD Legal"), on June 26, 2017, in *CFPB v. RD Legal*, at ECF No. 37.

4. Attached hereto as Exhibit C is the Affidavit of Roni Dersovitz in Support of Motion to Dismiss filed in *CFPB v. RD Legal*, at ECF No. 30-1 ("Dersovitz Affidavit") and refiled at ECF No. 41.

5. Attached hereto as Exhibit D are the cover letter and Requests for Production of Documents and Interrogatories propounded by Co-Lead Class Counsel upon RD Legal, on July 25, 2017.

6. Attached hereto as Exhibit E is the July 31, 2017 email response to the discovery requests from counsel for RD Legal.

7. Attached hereto as Exhibit F is the August 8, 2017 cover letter from counsel for RD Legal, along with RD Legal's responses to the discovery requests.

8. Attached hereto as Exhibit G-1 and G-2 are the redacted versions of Exhibits B-1 to B-3 and B-4 to B-7, respectively, which were filed as Exhibits to the Dersovitz Affidavit in *CFPB v. RD Legal*, at ECF Nos. 30-5, 30-6, refiled as ECF Nos. 41-4, 41-5.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 21, 2017

/s/ Christopher A. Seeger  
CHRISTOPHER A. SEEGER  
Co-Lead Class Counsel